

BEFORE THE
POSTAL REGULATORY COMMISSION
WASHINGTON, D.C. 20268-0001

COMPETITIVE PRODUCT PRICES
INBOUND EMS 2
(MC2009-10)

Docket No.
CP2018-287

**MOTION OF THE UNITED STATES POSTAL SERVICE
FOR EXTENSION TO FILE RESPONSES
TO CHAIRMAN'S INFORMATION REQUEST NO. 1**
(August 22, 2018)

The United States Postal Service respectfully moves for an extension of one (1) day to file its responses to the Chairman's Information Request No. 1 (the ChIR), which was issued August 17, 2018. In the ChIR, the Postal Regulatory Commission requested that the Postal Service file responses by August 22, 2018; if the Commission grants this Motion, responses would be due on August 23, 2018.

This extension is necessary to afford the Postal Service adequate time to research, prepare, and review its responses and the revised financial workpapers to accompany the responses. Through inadvertent oversight, the Postal Service did not factor Pay-for-Performance (PfP) financial penalties into the financial model initially submitted with its Notice in this docket on August 13. In the ChIR, the Commission has requested revised financial workpapers that incorporate financial penalties. In order to have adequate time to ensure that the responses and revised financial workpapers accurately incorporate such penalties, the Postal Service requests this one-day extension.

In Order No. 4759, the Commission ordered any comments in the docket to be filed by August 21, 2018. Because comments were due on August 21 before the date (August 22) by which the responses to the ChIR were originally due, the requested one-day extension for responses will not prejudice any party submitting comments. Further, in the comments that the Public Representative filed on August 21, the Public Representative observed that the model as initially submitted had not factored in potential PfP penalties, yet found it unlikely that such penalties would reduce cost coverage below a permissible level. The Public Representative therefore recommended approval of the proposed EMS rates.

Nevertheless, the Postal Service is working to respond to the ChIR by incorporating PfP penalties, but wants to ensure that what it files with the Commission is accurate and complete. Accordingly, the Postal Service respectfully requests a short extension of one (1) day to file its responses.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

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